

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

18 Cr. 713 (JMF)

-v-

NKANGA NKANGA,

Defendant.

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**EMERGENCY MOTION FOR COMPASSIONATE RELEASE DUE TO
INMATE'S HIGH RISK OF COVID-19 INFECTION AND DEATH; OR IN THE
ALTERNATIVE, A 30-DAY FURLOUGH**

Please take notice that Nkanga Nkanga, through undersigned counsel, respectfully moves the Court pursuant to 18 U.S.C. § 3582(c)(1)(A)(i) to modify his sentence and immediately release him to home confinement and a period of supervised release. In the alternative, Dr. Nkanga moves for a 30-day furlough pursuant to 18 U.S.C. § 3622. In support of the motion, counsel relies on the following incorporated memorandum of law and exhibit.

Respectfully submitted,

/s/ Daniel S. Parker

Daniel S. Parker

Joshua J. Horowitz

Benjamin Silverman

Attorneys for Nkanga Nkanga

Dated: April 2, 2020
New York, N.Y.